

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

**IN RE: CENTURYLINK SALES
PRACTICES AND SECURITIES
LITIGATION**

This Document Relates to:

Civil Action No. 18-296 (MJD/KMM)

MDL No. 17-2795 (MJD/KMM)

**DECLARATION OF RYAN E.
BLAIR IN SUPPORT OF
DEFENDANTS' SUR-REPLY
MEMORANDUM OF LAW IN
OPPOSITION TO PLAINTIFFS'
MOTION FOR CLASS
CERTIFICATION AND
APPOINTMENT OF CLASS
REPRESENTATIVES AND CLASS
COUNSEL**

I, Ryan E. Blair, hereby declare as follows:

1. My name is Ryan E. Blair and I am a Partner with the law firm of Cooley LLP. I am a member in good standing of the bar of California.

2. I serve as counsel to Defendants CenturyLink, Inc., Glen F. Post, III, R. Stewart Ewing, Jr., David D. Cole, Karen Puckett, Dean J. Douglas, and G. Clay Bailey in this matter.

3. I respectfully submit this declaration pursuant to 28 U.S.C. § 1746 in order to transmit to the Court certain documents referenced in Defendants' Sur-Reply Memorandum of Law in Opposition to Plaintiffs' Motion for Class Certification and Appointment of Class Representatives and Class Counsel filed concurrently herewith.

4. I have personal knowledge of the facts set forth in this Declaration.

5. Attached as **Exhibit 1** is a true and correct copy of excerpts of the transcript from the February 25, 2020 deposition of Michael L. Hartzmark.

6. Attached as **Exhibit 2** is a true and correct copy of the transcript from the June 5, 2020 deposition of Michael L. Hartzmark.

7. Attached as **Exhibit 3** is a true and correct copy of the Table Backup to paragraph 112 of the May 4, 2020 Reply Expert Report of Michael L. Hartzmark, provided by Plaintiffs' counsel to Defendants during the June 5, 2020 deposition of Michael L. Hartzmark.

8. Attached as **Exhibit 4** is a true and correct copy of highlighted excerpts of Appendix C to the Expert Report of Michael L. Hartzmark, filed January 21, 2020. Highlighted rows indicate non-"duplicate" dates, as described in Exhibit 3, for which Dr. Hartzmark calculated a statistically significant negative abnormal return.

I hereby declare under the penalty of perjury that the foregoing is true and correct.
Executed this 12th day of June, 2020, in San Diego, CA.

/s/ Ryan E. Blair

Ryan E. Blair